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March 19, 2008

**BY ELECTRONIC MAIL AND BY HAND DELIVERY**

The Honorable Vincent J. Poppiti

Special Master

Blank Rome LLP

Chase Manhattan Centre, Suite 800

Wilmington, DE 19801-4226

**Re: *Advanced Micro Devices, Inc. et al. v. Intel Corporation, et al., C.A. No. 05-441-JJF; In re Intel Corporation, C.A. No. 05-MD-1717-JJF; and Phil Paul, et al. v. Intel Corporation, C.A. 05-485-JJF***

Dear Judge Poppiti:

In response to Your Honor's order of March 17, 2008, the parties provide this joint report on the status of the parties' document production.

**Party and Adverse Party Designated Custodians**

As required by Case Management Order No. 3, AMD and Intel each completed their production of Party and Adverse Party Designated Custodian documents on February 15, 2008, except for: (1) foreign language documents; (2) documents redacted for privilege or which require a detailed privilege review; and (3) a *de minimis* number of documents requiring supplemental production.

As to foreign language documents, the parties will complete the production for Party and Adverse Party Designated Custodians by March 31, 2008, the deadline set by Case Management Order No. 3. The parties have not yet agreed to a deadline by which privilege review and any supplemental production of redacted documents or documents determined to be non-privileged must be completed. The parties are confident that they can reach agreement on this issue shortly, however, and will provide a supplemental report to Your Honor, if and as requested. The *de minimis* supplemental productions referenced above are being made in the ordinary course, and will not impair case progress.

**Free Throw Custodians**

AMD and the Class have designated for production of documents five of the 50 Intel "Free Throw" Custodians to which they are entitled under Case Management Order No. 3. Intel

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has designated 12 of the 25 AMD Free Throw Custodians to which it is entitled. No party has yet completed the production of documents for a Free Throw Custodian. Currently, there are no deadlines set for the identification or production of the documents of Free Throw Custodians.

### **Deposition Reharvests**

Under Case Management Order No. 3, AMD and the Class are entitled to request deposition reharvests for 120 Intel custodians, and Intel is entitled to request deposition reharvests for 60 AMD custodians. To date, AMD and the Class have requested deposition reharvests for 47 Intel custodians, and Intel has completed the productions for 20 of these custodians. Intel made its first deposition reharvest requests for 10 AMD custodians on March 18, 2008.

### **Privilege Logs**

As required by the Stipulation and Order Regarding the Preparation of Privilege Logs, AMD and Intel have produced privilege logs through the first production of their respective Party Designated Custodians. Neither party has exercised its right to designate additional Privilege Log Custodian Picks.

### **Corporate Requests**

AMD and Intel are in the process of producing documents responsive to the requests designated in the Stipulation and Order Regarding Document Production as "corporate requests." Both AMD and Intel have already produced sales data responsive to certain of the corporate requests, and AMD has also already produced some other materials responsive to corporate requests. Both AMD and Intel are in the process of producing additional documents responsive to these requests. AMD and Intel have agreed upon a deadline of April 15, 2008, for completion of their respective productions in response to the document requests identified as "corporate requests" (except to the extent cost data, the production of which is being separately negotiated by AMD and Intel as set forth below -- is responsive to the corporate requests).

### **Additional Document Requests**

Both Intel and AMD have propounded a limited number of additional document requests that post-date and are not subject to the Stipulation and Order Regarding Document Production. These requests seek, among other things, certain financial and cost-related information. Intel and AMD are working to respond to these requests, including through the mutual production of cost data. There is currently no established deadline for the completion of production in response to these requests.

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Respectfully,

*/s/ Steven J. Fineman*

Steven J. Fineman (#4025)

SJF/afg

cc: Clerk of the Court (By Electronic Filing)  
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James L. Holzman, Esquire (Via Electronic Mail)